

OU15 Meeting Summary

Meeting Location, Date and Time:

EPA Region VIII Headquarters, Denver, CO, Juniper Room
March 27, 1995
9:00 AM - 10:45 AM

Meeting Attendees:

Mark Aguilar (EPA)
Arturo Duran (EPA)
William Fitch (DOE)
Roland Hea (ERM)

Rich Ray (EG&G)
Dennis Schubbe (EG&G)
Carl Spreng (CDPHE)

Meeting Summary:

The meeting began at 9:00 AM.

William Fitch explained that the purpose of the meeting was to give EPA and CDPHE an initial opportunity to comment on the Draft OU15 Proposed Plan, dated March 21, 1995. Arturo Duran stated that he wanted the meeting to be an informal review of the Proposed Plan, focusing on big-ticket items. All parties agreed that this was appropriate and began to review the Proposed Plan document. Several editorial changes were proposed on the first page.

Arturo Duran asked DOE to present their understanding of what was going to be done for OU15. William Fitch replied that DOE was pursuing a CAD/ROD for OU15 under the No Action alternative. Dennis Schubbe added that for No Action, the ARARs need to be met, with the ultimate goal of protecting human health and the environment.

Arturo Duran agreed that no cleanup action was necessary for OU15, but that the radiological control program must continue to be implemented until final disposition of the buildings. He stated that this was different from a No Action decision. He added that EPA would complete a CAD/ROD instead of an IM/TRA, but that the CAD/ROD needed to include the use of institutional controls. Arturo Duran explained that the decision could then be revisited under the 5-year review provision. He said that if DOE deviated from this path, then OU15 would need to go back to an IM/TRA.

William Fitch asked the meeting participants to read the information box in the Proposed Plan titled, "The Radiological Control Program." Carl Spreng explained that the institutional controls requested by EPA were already established by Federal law and DOE Orders. He also said that

the Proposed Plan should indicate that the radiological control program already exists and is not a new requirement. He added that the six OU15 IHSSs were ready for RCRA closure. Arturo Duran stated that EPA did not question DOE's radiological control protocols or their commitment to implementing and maintaining them.

William Fitch stated that DOE had a problem with the use of the term "institutional controls," and asked if the term "administrative controls" could be used instead. Arturo Duran responded that if the controls were simply an issue of paperwork, it would be appropriate, but since the radiological control program also involved physical controls it was not. William Fitch said that he would need to take this issue back to DOE management. Arturo Duran said that Frazier Lockhart had not had a problem with the use of institutional controls during the January OU15 meeting held at CDPHE. Rich Ray summarized that this was a management issue that could not be resolved during the meeting, and suggested that the attendees proceed with the review of the Proposed Plan document.

The parties continued their review of the Proposed Plan. Carl Spreng suggested that the statutory authority for DOE orders be included. Mark Aguilar proposed that an explanation of what is contained in the gray-shaded information boxes be added to the text. Arturo Duran provided some alternate language for describing the objectives of the RFI/RI in the Summary of Site Risks section.

Arturo Duran asked about how the radiological screening was performed for the six OU15 IHSSs in the RFI/RI Report. Roland Hea and Dennis Schubbe explained the conservative screening process, highlighting the assumptions and methodology used. Arturo Duran said he would need to go back to the RFI/RI Report to review the screening data. He suggested that, perhaps, a No Action decision under CERCLA would be appropriate for five of the OU15 IHSSs (excluding IHSS 204, the Original Uranium Chip Roaster). He added that if these IHSSs did not pose an unacceptable risk to workers, then institutional controls would not be necessary. Arturo Duran indicated that No Action under RCRA and CERCLA could be applied to IHSSs 178, 179, 180, 211 and 217. IHSS 204 meets the RCRA closure requirements, and would only need to continue to be addressed with respect to CERCLA.

Arturo Duran asked what triggered the implementation of the protocols associated with the radiological control program. William Fitch and Dennis Schubbe described the use of radiological surveys and radiation work permits. William Fitch mentioned that the Chip Roaster could be split out of OU15, allowing the remaining five IHSSs to proceed with a No Action decision. Dennis Schubbe indicated that deferring IHSSs into a D&D category had been done for some of the Industrial Area OUs. Carl Spreng said that the Chip Roaster could still be closed-out with respect to RCRA.

Mark Aguilar asked if future operations in the buildings could impact the OU15 IHSSs. Dennis Schubbe replied that fluctuations in radiological levels could be experienced based on the conduct of decontamination efforts throughout the rest of the OU15 buildings. Arturo Duran reiterated that he needed to go back and review the radiological data and screening results for the five

OU15 IHSSs. He stated that if EPA concurred with the screening results, then the No Action alternative could be used for the five IHSSs. If not, then institutional controls would need to be applied for these IHSSs.

Arturo Duran asked about the potential for later contaminating the IHSSs selected for No Action. Rich Ray replied that if releases occurred after closure and were not related to operations in the IHSS, they would be addressed as a building issue. Arturo Duran agreed that under these circumstances, the areas would not need to be reevaluated as OU15 IHSSs.

Arturo Duran suggested that it would be useful to have a presentation on the radiological screening process used during the RFI/RI. He added that EPA's risk assessment group should be present at the meeting. Dennis Schubbe also proposed inviting EPA's and CDPHE's radiation experts. The meeting was tentatively scheduled to be held at EPA on Monday, April 3, 1995 at 9:00 AM.

William Fitch summarized EPA's position by stating that EPA was seeking an institutional control CAD/ROD, but would support No Action for all the IHSSs except IHSS 204 if warranted. Carl Spreng added that IHSS 204 could remain in the Proposed Plan if institutional controls were specified for this IHSS. A short discussion on the project schedule followed, with all parties agreeing that a decision regarding milestone dates should be delayed until after the meeting on April 3, 1995. Arturo Duran closed the meeting by saying that he felt that DOE, EPA and CDPHE were close to agreement on an approach for OU15, and once this was worked out the remainder of the process should go quickly.

The meeting adjourned at 10:45 AM.

OU15 Meeting Summary

Meeting Location, Date and Time:

EPA Region VIII Headquarters, Denver, CO, Timberline Room
April 3, 1995
9:00 AM - 11:40 AM

Meeting Attendees:

Mark Aguilar (EPA)
Jerry Anderson (EG&G)
Arturo Duran (EPA)
William Fitch (DOE)
Eric Graham (ERM)
John Haasbeek (ERM)

Dick Hyland (RTG/DOE)
Tom Pentecost (CDPHE/RCD)
Richard Ray (EG&G)
Dennis Schubbe (EG&G)
Carl Spreng (CDPHE)
Rob Terry (CDPHE/RCD)

Meeting Summary:

The meeting began at 9:00 AM.

Dennis Schubbe wanted to clarify the Price Anderson Amendments Act, which was briefly discussed in the March 27, 1995 meeting. Jerry Anderson explained that Price Anderson acts as the go to jail or "hammer" provision. He also noted that other DOE orders are currently being codified and that 10 CFR 834 should be issued sometime this summer.

Arturo Duran began the meeting by stating that Mark Aguilar may be taking over the OU15 project for EPA. Since there were State and EPA personnel attending the meeting who were not familiar with OU15, William Fitch gave a quick synopsis of the project. The focus of the meeting then shifted to the radionuclide screening process used for OU15 and John Haasbeek began his presentation.

During this presentation, many items were discussed concerning the IHSSs, RCAs, NCPP, the GEN II model, and the level of conservatism in the results. Clarification on these issues was provided by Richard Ray, Dennis Schubbe, Jerry Anderson, Arturo Duran, Carl Spreng, John Haasbeek, and William Fitch. A copy of John Haasbeek's presentation is attached.

Arturo Duran proposed that the EPA would like to pursue three items. The first would consist of Clean Closure under RCRA for all six IHSSs. The second would be a "No Action" decision for the three IHSS located in Building 881. This "No Action" would not require any institutional controls. The third item would be to defer any actions at the remaining three IHSSs (IHSSs 179, 180, and 204) until final disposition of their respective buildings. These three

IHSSs are located in RCAs and are associated with NCPP redevelopment activities. Arturo Duran stated that Martin Hestmark is on board with this proposal and that EPA does not want to spend more time on these issues. The EPA does not feel that DOE can prove that contamination in the buildings did not come from the IHSSs. Therefore, they want to defer any actions at the IHSSs until final building disposition. The three IHSSs which EPA proposed to close with "No Action" were singled out because of their location in non-radiologically controlled areas.

William Fitch directed EG&G to rewrite the Draft Proposed Plan to incorporate the changes proposed by EPA.

The meeting adjourned at approximately 11:40 AM.